

LAW OFFICES OF  
STEVEN C. KISER

TELEPHONE  
(949) 760-1164  
FAX  
(949) 729-1637

366 SAN MIGUEL DRIVE  
SUITE 312  
NEWPORT BEACH, CALIFORNIA  
92660

June 7, 2012

Via Hand Delivery

Newport Beach Planning Commission  
3300 Newport Boulevard  
Newport Beach, CA 92663

Re: Newport Place Planned Community Amendment No. PD2011-005

Dear Planning Commissioners:

These comments to Newport Place Planned Community Amendment No. PD2011-005 (the "**PC Amendment**") are submitted on behalf of my client, Lucas-Gianulias, a California general partnership that owns office condominiums at 1101 – 1107 Quail Street, which is within the Newport Place Planned Community ("**Newport Place**").

The proposed PC Amendment implementing Housing Programs 3.2.2 and 3.2.3 to permit residential development for lower income households within Newport Place should not be recommended by the Planning Commission for adoption by the City Council. The addition of residential uses in Newport Place does not make sense from a planning standpoint because it would create an island of residences in a sea of office and industrial uses. The General Plan Policy of requiring residential neighborhoods in the Airport Area to have a minimum of 10 contiguous acres centered on a neighborhood park and other amenities should not be changed.

Allowing up to 50 dwelling units per acre will require residential structures that will potentially house hundreds of families. Where are the schools, the day care centers, libraries, parks, medical services and other facilities that will be needed by those families? Where will the kids play? Skateboarding on MacArthur Boulevard or Bristol North sounds like an accident waiting to happen. It is bound to happen when there are no ball fields, basketball courts or nearby parks of any sort.

Where is the nearest grocery store? A Coco's and some fast food places at opposite ends of the planning area will not meet the needs of the many residents that would live in

Newport Beach Planning Commission

June 7, 2012

Page 2 of 2

Newport Place if a development is built under Housing Programs 3.2.2 and 3.2.3. From a planning standpoint, how far should a resident of a new development have to drive to buy groceries? Allowing residences to be plunked down in the expanse of the commercial/industrial airport area looks like a return to the days of "spot zoning" with all of its attendant problems.

There certainly must be far superior alternative locations in Newport Beach for meeting the City's obligation to provide units affordable to lower income households. The Planning Commission should not allow State mandates, the withdrawal of State funding programs, or other fiscal pressures to drive the planning process into bad decisions. Supporting Newport Place Planned Community Amendment No. PD2011-005, permitting residential development in Newport Place, would be such a decision.

Kindest Regards,



Steven C. Kiser